# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE \* CASE NO. 15-07825/ESL

ELIZA ZAYAS ZAYAS \*

\* CHAPTER 13

DEBTOR \*

## DEBTOR'S MOTION IN COMPLIANCE WITH ORDER DATED DECEMBER 18, 2018 DOCKET #55 RE: CURING OF PLAN PAYMENTS ARREARS

### TO THE HONORABLE COURT:

NOW COMES, ELIZA ZAYAS ZAYAS, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 18, 2018, the Court issued the following Order.

#### "ORDER:

The motion filed by Debtor requesting extension of time of (30) days to reply the motion to dismiss filed by Reliable Auto (docket #54) is hereby granted. Order due by January 14, 2019". *Order*, dated December 18, 2018, docket no. 55.

- The Debtor respectfully submits that she has cured any and all arrears in her confirmed Plan payments to the Trustee. Attached is copy of *Trustee's Financial Summary*, to evidence payments.
- 3. The debtor respectfully submits that she is up-to-date in the confirmed Plan payments, thus, respectfully requests the Court to take note of said Plan payments and deny the Trustee's motion to dismiss, docket #50, in the above captioned case.

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion in compliance with *Order* dated December 18, 2018, docket #55, in the above case.

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I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send sent notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to debtor Eliza Zayas Zayas, HC20 Box 26375, San Lorenzo, PR 00754.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 3<sup>rd</sup> day of January, 2019.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONER

ATTORNEY FOR PETITIONER PO BOX 186 CAGUAS PR 00726 TEL NO 787-744-7699 FAX 787-746-5294

Email: rfigueroa@rfclawpr.com

# Breakdown for Combined Schedules

Period (Month/Year)         Due (Month/Year)         Payment Due (Month/Year)         Payment Payment Payment Progrew Amount Due \$0.00           1         11/2015         \$175.00         \$175.00           2         12/2016         \$175.00         \$175.00           3         1/2016         \$175.00         \$175.00           4         2/2016         \$175.00         \$175.00           5         3/2016         \$175.00         \$175.00           6         4/2016         \$175.00         \$175.00           7         5/2016         \$175.00         \$175.00           8         6/2016         \$175.00         \$175.00           9         7/2016         \$175.00         \$175.00           10         8/2016         \$175.00         \$175.00           11         9/2016         \$175.00         \$175.00           11         9/2016         \$175.00         \$175.00           11         9/2016         \$175.00         \$175.00           12         10/2016         \$175.00         \$175.00           13         11/2016         \$175.00         \$175.00           14         12/2016         \$175.00         \$175.00           15         1	Breakdown for Combined Schedules						
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22       8/2017       \$175.00       \$350.00         23       9/2017       \$175.00       \$350.00         24       10/2017       \$175.00       \$350.00         25       11/2017       \$175.00       \$525.00         26       12/2017       \$175.00       \$700.00       \$0.00         27       1/2018       \$175.00       \$175.00       \$175.00         28       2/2018       \$175.00       \$175.00       \$175.00         29       3/2018       \$175.00       \$175.00       \$175.00         30       4/2018       \$175.00       \$350.00       \$0.00         31       5/2018       \$175.00       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00       \$350.00         36       10/2018       \$175.00       \$350.00       \$350.00         37       11/2018       \$175.00       \$525.00       \$0.00	20	6/2017	\$175.00	\$175.00		\$175.00	
23       9/2017       \$175.00       \$350.00       \$175.00         24       10/2017       \$175.00       \$350.00         25       11/2017       \$175.00       \$525.00         26       12/2017       \$175.00       \$700.00       \$0.00         27       1/2018       \$175.00       \$175.00       \$175.00         28       2/2018       \$175.00       \$175.00       \$175.00         29       3/2018       \$175.00       \$175.00       \$175.00         30       4/2018       \$175.00       \$350.00       \$0.00         31       5/2018       \$175.00       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00       \$350.00         36       10/2018       \$175.00       \$175.00       \$350.00         37       11/2018       \$175.00       \$525.00       \$0.00	21	7/2017	\$175.00			\$350.00	
24       10/2017       \$175.00       \$350.00         25       11/2017       \$175.00       \$525.00         26       12/2017       \$175.00       \$700.00       \$0.00         27       1/2018       \$175.00       \$175.00         28       2/2018       \$175.00       \$175.00         29       3/2018       \$175.00       \$175.00         30       4/2018       \$175.00       \$350.00         31       5/2018       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00         38       12/2018       \$175.00       \$525.00       \$0.00	22	8/2017	\$175.00	\$175.00		\$350.00	
25       11/2017       \$175.00       \$525.00         26       12/2017       \$175.00       \$700.00       \$0.00         27       1/2018       \$175.00       \$175.00         28       2/2018       \$175.00       \$175.00         29       3/2018       \$175.00       \$175.00         30       4/2018       \$175.00       \$350.00         31       5/2018       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00         38       12/2018       \$175.00       \$525.00       \$0.00	23	9/2017	\$175.00	\$350.00		\$175.00	
26       12/2017       \$175.00       \$700.00       \$0.00         27       1/2018       \$175.00       \$175.00         28       2/2018       \$175.00       \$175.00         29       3/2018       \$175.00       \$175.00         30       4/2018       \$175.00       \$350.00       \$0.00         31       5/2018       \$175.00       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$525.00       \$0.00	24	10/2017	\$175.00			\$350.00	
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28       2/2018       \$175.00       \$175.00         29       3/2018       \$175.00       \$175.00         30       4/2018       \$175.00       \$350.00       \$0.00         31       5/2018       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$525.00       \$0.00	26	12/2017	\$175.00	\$700.00		\$0.00	
29       3/2018       \$175.00       \$175.00         30       4/2018       \$175.00       \$350.00       \$0.00         31       5/2018       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00         38       12/2018       \$175.00       \$525.00       \$0.00	27	1/2018	\$175.00			\$175.00	
30       4/2018       \$175.00       \$350.00       \$0.00         31       5/2018       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00       \$350.00         38       12/2018       \$175.00       \$525.00       \$0.00	28	2/2018	\$175.00	\$175.00		\$175.00	
31       5/2018       \$175.00       \$175.00         32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00         38       12/2018       \$175.00       \$525.00       \$0.00	29	3/2018	\$175.00	\$175.00		\$175.00	
32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00         38       12/2018       \$175.00       \$525.00       \$0.00	30	4/2018	\$175.00	\$350.00		\$0.00	
32       6/2018       \$175.00       \$175.00         33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00         38       12/2018       \$175.00       \$525.00       \$0.00	31	5/2018	\$175.00			\$175.00	
33       7/2018       \$175.00       \$175.00         34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00         38       12/2018       \$175.00       \$525.00       \$0.00		6/2018	\$175.00	\$175.00		\$175.00	
34       8/2018       \$175.00       \$175.00         35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00       \$350.00         38       12/2018       \$175.00       \$525.00       \$0.00		7/2018	\$175.00	\$175.00		\$175.00	
35       9/2018       \$175.00       \$175.00         36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00       \$350.00         38       12/2018       \$175.00       \$525.00       \$0.00		8/2018	\$175.00	\$175.00		\$175.00	
36       10/2018       \$175.00       \$350.00         37       11/2018       \$175.00       \$175.00       \$350.00         38       12/2018       \$175.00       \$525.00       \$0.00				\$175.00		\$175.00	
37       11/2018       \$175.00       \$175.00       \$350.00         38       12/2018       \$175.00       \$525.00       \$0.00		10/2018	\$175.00			\$350.00	
38 12/2018 \$175.00 \$525.00 \$0.00		11/2018	\$175.00	\$175.00		\$350.00	
20.27 2020						\$0.00	
	39	1/2019				\$0.00	

Total Delinquent Amount: \$0.00

#### FINANCIAL SUMMARY - CASE 15-07825

ELISA ZAYAS ZAYAS paying \$175.00 MONTHLY



Trustee Disb Rcpts/Deb Refunds | Disbursements Adjustments Trustee Adi Limits: Select Start Date Select Claim ID Select Payee Name Check Status: Cleared Stale Dated Stop Payment Cancelled Voided Outstanding Date Pavee Payee Name Source / Check Description Receipts Disbursements Balance 12/28/2018 6770 91W00 0003 INTERNET PAYMENT \$175.00 12/14/2018 5662 83W00 0003 INTERNET PAYMENT \$175.00 12/11/2018 5263 84W00 0003 INTERNET PAYMENT RETURNED (\$175.00) 12/10/2018 5263 84W00 0003 INTERNET PAYMENT \$175.00 12/10/2018 5197 65W00 0003 INTERNET PAYMENT \$175.00 11/26/2018 3870 42W00 0003 INTERNET PAYMENT \$175.00 11/7/2018 2074 36W00 0003 INTERNET PAYMENT RETURNED (\$175.00)11/6/2018 2074 36W00 0003 INTERNET PAYMENT \$175.00 9/21/2018 6692 75W00 0003 INTERNET PAYMENT \$175.00 INTERNET PAYMENT 8/23/2018 3907 11W00 0003 \$175.00 7/6/2018 7774 84W00 0003 INTERNET PAYMENT \$175.00 6/25/2018 6604 24W00 0003 INTERNET PAYMENT \$175.00 4/25/2018 9600 02W00 0003 INTERNET PAYMENT \$175.00 4/12/2018 7671 53W00 0003 INTERNET PAYMENT \$175.00 3/27/2018 5979 96W00 0003 INTERNET PAYMENT \$175.00 3/14/2018 4558 95W00 0003 INTERNET PAYMENT RETURNED (\$175.00)3/13/2018 4558 95W00 0003 INTERNET PAYMENT \$175.00 2/6/2018 1422 75W00 0003 INTERNET PAYMENT \$175.00 INTERNET PAYMENT 12/22/2017 6655 73W00 0003 \$175.00 12/18/2017 0714 86900 0003 TELEPAGO \$175.00 12/18/2017 0714 86900 0003 TELEPAGO \$175.00 12/18/2017 0714 86900 0003 TELEPAGO \$175.00 9/15/2017 1820 51W00 0003 INTERNET PAYMENT \$175.00 9/13/2017 1539 11W00 0003 INTERNET PAYMENT \$175.00 8/28/2017 9084 19W00 0003 INTERNET PAYMENT \$175.00 6/2/2017 9637 51W00 0003 INTERNET PAYMENT \$175.00 5/2/2017 6320 15W00 0003 INTERNET PAYMENT \$175.00 4/11/2017 3499 77W00 0003 INTERNET PAYMENT \$175.00 2/17/2017 7551 38W00 0003 INTERNET PAYMENT \$175.00 2/13/2017 6907 74W00 0003 INTERNET PAYMENT \$175.00 1/18/2017 4305 19W00 0003 INTERNET PAYMENT \$175.00 1/4/2017 2963 69W00 0003 INTERNET PAYMENT \$175.00 12/2/2016 9164 17W00 0003 INTERNET PAYMENT \$175.00 10/28/2016 6043 99C00 0003 INTERNET PAYMENT \$175.00 9/30/2016 3326 58C00 0003 INTERNET PAYMENT \$175.00 8/16/2016 8404 93C00 0003 \$175.00 INTERNET PAYMENT 7/5/2016 4220 02C00 0003 INTERNET PAYMENT \$175.00 6/13/2016 2355 84C00 0003 \$175.00 INTERNET PAYMENT \$175.00 5/3/2016 7672 21C00 0003 INTERNET PAYMENT 4/6/2016 4591 24W00 0003 INTERNET PAYMENT \$175.00 3/8/2016 1944 40W00 0003 INTERNET PAYMENT \$175.00 2/1/2016 7806 07W00 0003 INTERNET PAYMENT \$175.00 1/4/2015 5369 73W00 0003 INTERNET PAYMENT \$175.00 11/9/2015 1322 15W00 0003 INTERNET PAYMENT \$175.00 Totals: \$6,650.00 \$0.00

1 of 1 1/3/2019, 10:35 AM